

From: [REDACTED]] On Behalf Of Dan Reineman
Sent: Friday, November 22, 2013 4:22 PM
To: [REDACTED]
Subject: Re: Coastal Commission Announces Release of Draft Sea Level Rise Guidance

>>>> First, let me say that the document is quite an achievement! SO much science, so many impacts, so so many policies and processes to consider and integrate -- I am really impressed! As a bonus, it is well organized, clearly presented, easily searchable, etc. Well done.

As you know, my work focuses on how public access is created and managed and that (in my context) includes related access-to-recreation issues like the size of a beach and the quality of a wave. So I was of course pleased to see that the relationship between these resources and sea-level rise received plenty of attention in the document. I was also pleased to see that where the impacts of sea-level rise on surfing are concerned, the report calls for more research and for local jurisdictions to support such research. With any luck, within the next six months, I'll be able to present data better predicting these impacts. I'll be sure to share results your way!

It seems as though a principle method for assessing "damage" to recreation areas (in order to set mitigation levels) is based on economic valuation; fortunately, there is a developing literature ("surfenomics") around the valuation of wave resources. My impression is that at present these studies are designed around the value of single surf spots. But spots never exist in isolation -- it is the entire coastal wavescape that is important. In other words, surfers rarely just surf in one place -- if conditions there are not ideal, they'll go to the next place. The value of one wave, then, is relative to the surrounding waves. As soon as you begin to factor in the diminishing marginal value of a spot as it becomes more crowded...well, things get complicated. Another aspect of my work will examine the value of various coastal resources, but not their financial value. But I think I am digressing.

There is another, slightly larger issue which may or may not be addressed in the draft guidance doc (I confess, I did not close read the whole thing!), and that is around cumulative impacts. For example, the susceptibility of a beach (and perhaps a larger extent, its associated waves) to SLR is not just a function of the rate of sea-level rise anticipated in its particular region of the coast combined with, say, the degree to which the coastal bluff it abuts is armored and able to erode naturally. It is also a function of impacts further afield -- to the local littoral cell through the creation of groins, jetties, harbors, piers, etc, to sediment management through dredging, replenishment, nourishment, etc; and to the watershed, where significant potential future coastal sediment is trapped in dams, catchments and water courses are severely altered, etc. All these factors (and others I probably haven't thought of) combine to influence the type, quality, and adaptive capacity of both beaches and waves. Alas, many of these factors are outside the jurisdiction of a single coastal LCP. To what extent does the Coastal Act enable coordination between local coastal jurisdictions, inland jurisdictions, etc.

Generally, I think the CCC is in a tough spot -- trying to navigate the interplay between protecting private property and public rights and in my own humble opinion, the Coastal Act (and the court) gives the public short shrift in this regard. Alas, I suppose this boils down (or abstracts up) to a much larger philosophical, ethical, and legal debate -- not a debate within the purview of an agency guidance document!

While I doubt there is anything in this email that is substantively useful to you in terms of improving the draft, hopefully it's at least fodder for a conversation. Either way, I'd be really interested to sit down to talk with you about it all; my schedule is quite flexible in the coming weeks.

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Sincerely,

Dan